

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(NORTHERN DIVISION)**

**DOREEN HENRY**

\*

*Plaintiff,*

\*

**Case No.: 1:23-cv-01285-SAG**

**v.**

\*

**TERRANCE HALL, *ET AL.***

\*

*Defendants.*

\*

\*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*

**PLAINTIFF’S CONSENT MOTION TO MODIFY SCHEDULING ORDER**

Plaintiff Doreen Henry (“Plaintiff” or “Ms. Henry”), by and through her undersigned counsel and pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Section IV of this Court’s Scheduling Order (ECF No. 28), hereby files this Consent Motion to Modify the Scheduling Order (“Consent Motion”) and extend the current deadlines therein by 75 days. In support thereof, Plaintiff states as follows:

1. On or about May 16, 2023, Ms. Henry filed a five-count Complaint against Terrance Hall (“Mr. Hall”) and Lisa Hall (“Mrs. Hall”) (collectively, “Defendants”) alleging Count I: Fraud (Against All Defendants); Count II: Constructive Trust (Against All Defendants); Count III: Breach of Fiduciary Duty (Against Defendant Terrance Hall); Count IV: Civil Conspiracy (Against All Defendants); and Count V: Aiding and Abetting (Against Defendant Lisa Hall). ECF No. 1.

2. On or about June 30, 2023, Defendants filed their Answer. ECF No. 8.

3. Pursuant to this Court’s Order setting a conference call to discuss the Draft Scheduling Order (ECF No. 9), the Parties conferred with each other and communicated to the

Court on July 26, 2023, during their conference call with the Court, their desire to engage in an early ADR conference with a Magistrate Judge. Thereafter, the Court issued a stay of this case for 90 days and referred this matter to Magistrate Judge Coulson for early ADR. (ECF Nos. 10, 11)

4. Shortly before the parties' settlement conference scheduled on September 13, 2023, former counsel for Defendants made known to the undersigned that he intended to withdraw his appearance. As such, the settlement conference was cancelled. Thereafter, on or about October 26, 2023, a Motion to Withdraw (ECF No. 18) was filed, which this Court granted on October 30, 2023 (ECF No. 22). The Court's Order stayed the case for 30 days to allow the Defendants to obtain new counsel, which they did not do.

5. Thereafter, on or about February 20, 2024, Plaintiff requested the issuance of a scheduling order pursuant to Local Rule 103.9 and 104.4. ECF No. 27.

6. On or about February 22, 2024, this Court issued a Scheduling Order. ECF No. 28.

7. On or about March 26, 2024, Plaintiff issued Interrogatories, Requests for Production of Documents, and Requests for Admissions by first-class mail to the Defendants.

8. The deposition and discovery deadline under the Scheduling Order is May 24, 2024.

9. Defendants' discovery was due on or about April 29, 2024, however, Defendants requested additional time to provide their discovery due to their alleged delay of receipt of Plaintiff's discovery requests by mail. As a result, the Parties agreed that Defendants will provide their discovery answers and responses to Plaintiff no later than May 27, 2024.

10. Plaintiff also has scheduled the depositions of Defendants for June 18, 2024 given the necessary time to receive and review Defendants' discovery and raise any potential discovery issues with the Defendants and the Court.

11. Further, simultaneously with the filing of this Consent Motion, Plaintiff has filed a Motion for Leave to Amend the Complaint to add a necessary party along with the proposed Amended Complaint (to which Defendants did not consent to as explained in the Motion for Leave), which will require the Defendants to answer pursuant to the time set forth in the Federal Rules of Civil Procedure.

12. The Plaintiff, therefore, requests that this Court amend the Scheduling Order as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>New Deadline</b>
Depositions and Discovery	May 24, 2024	August 7, 2024
Status Report	May 24, 2024	August 7, 2024
Summary Judgment Motions	June 24, 2024	September 7, 2024

13. The requested extensions afford the Plaintiff adequate time to conduct any further discovery and depositions of any other potential witnesses after conducting the depositions of the Defendants on June 18, 2024.

14. No Party (nor this Court) will be prejudiced by the relief sought herein as a trial date has not yet been set in this matter and, further, the Parties submit that the foregoing modified deadlines will allow for the Parties to completely, but efficiently, conduct all needed discovery while also ensuring judicial economy. Good cause exists to modify and extend the Scheduling Order.

15. Defendants have reviewed this Consent Motion and consent to its contents, including the requested extension of all deadlines outlined herein.

WHEREFORE, Plaintiff Doreen Henry, respectfully requests this Court grant this Consent Motion as set forth herein and extend all deadlines under the Scheduling Order by 75 days, and grant such other further relief as this Court deems necessary and proper.

Date: May 16, 2024

/s/ Jonathan P. Kagan

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*Counsel for Plaintiff*

*Doreen Henry*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16th day of May, 2024, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF filing system and served via email and first-class mail, postage prepaid, to the following:

Mr. Terrance Hall  
Mrs. Lisa Hall  
7621 Wilhelm Avenue  
Baltimore, MD 21237  
Email: [Ross\\_c1933@yahoo.com](mailto:Ross_c1933@yahoo.com)

*Pro-Se Defendants*

/s/ Veronica J. Mina

Veronica J. Mina (D. Md. Bar No. 30472)